

Exhibit J

1 NO. 21-CI-06290

JEFFERSON CIRCUIT COURT
DIVISION FOUR (4)
JUDGE JULIE KAELIN

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5 MATTHEW STRECK, Individually, et al. PLAINTIFFS

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8 V. VIDEO DEPOSITION FOR THE DEFENDANTS

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11 JOHNSON AND JOHNSON, et al. DEFENDANTS

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15 DEPONENT: WILLIAM E. LONGO, Ph.D.

16 DATE: MAY 16, 2023

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1 That's done by another individual at your lab?

2 A. Correct. I don't -- I don't analyze
3 these from start to finish. I just get called in if
4 there's a question or -- on the refractive indices or
5 structure, sort of the tiebreaker.

6 Q. Okay. And so am I correct that for
7 each of the 21 Gold Bond samples identified on this
8 chart, as well as the additional sample that you
9 referenced a moment ago for a total of 22 samples,
10 those were all tested for purposes of the PLM
11 analysis for chrysotile by Mr. Paul Hess, is that
12 right?

13 A. Yes, sir, I believe so.

14 Q. Okay. And it's -- is it Mr. Hess --
15 he's the one who's looking through the PLM microscope
16 to make the determination of the particle's color and
17 then also a determination to match it to a refractive
18 index?

19 A. Yes.

20 Q. And he makes that determination in
21 both the parallel orientation of the particle as well
22 as the perpendicular orientation of the particle,
23 correct?

24 A. That is correct.

25 Q. Is it Mr. Hess that also makes the

1 30 -- 31 or 32 other structures that have been
2 identified as chrysotile, correct?

3 A. He is.

4 Q. And the slides -- the microscope
5 slides that would support the data and his finding
6 that there were 37 bundles of chrysotile, those
7 slides are discarded shortly after the analysis,
8 correct?

9 A. They don't last within a couple of
10 weeks.

11 Q. And so they would be discarded,
12 correct?

13 A. Yes.

14 Q. Let me get out of this.

15 Dr. Longo, at the beginning of the
16 deposition we were talking about exposures, and you
17 talked about Mr. Streck's exposure through brake work
18 and the Americana project, and I believe the term you
19 used was "significant exposure." Is that the term
20 you're comfortable using?

21 A. Yes. I just -- I don't use it as a --
22 when I say "significant," I'm using it as significant
23 over background, which I don't -- which background
24 asbestos, in my opinion, does not exist unless
25 asbestos is being disturbed, but I use it as a

1 things we were just talking about.

2 I think you said that PLM analysis
3 is -- whether it's subjective depends on the analyst
4 who's performing the analysis, or something along
5 those lines, is that correct?

6 A. That's correct.

7 Q. And so just to make sure I'm clear --

8 A. And how much experience they have on
9 doing this, you know, repetitive, et cetera. And so
10 just doing asbestos-added products, you know, it's
11 pretty straightforward.

12 Q. But you wouldn't disagree that there's
13 certainly a subjective element to PLM analysis.

14 A. You know, just depends on your
15 training and how much experience you've got. You
16 know, this -- and it's typically .00 -- 0.0005 is the
17 error rate. So it's like anything else, these types
18 of analysis. But I don't think it's that subjective
19 if you are well experienced and you look at standards
20 and you validate the method.

21 Q. And this subjective part would be
22 somebody looks under a microscope, looks at a sample
23 under a PLM microscope, and they try to match up the
24 color they're seeing to the color on a central
25 dispersion staining chart, correct?

1 STATE OF KENTUCKY)
2 COUNTY OF JEFFERSON) (SS:
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4 I, ELLEN L. COULTER, Notary Public,
5 State of Kentucky at Large, hereby certify that the
6 foregoing deposition was taken at the time and place
7 stated in the caption; that the appearances were as
8 set forth in the caption; that prior to giving
9 testimony the witness was first duly sworn by me;
10 that said testimony was taken down by me in
11 stenographic notes and thereafter reduced under my
12 supervision to the foregoing typewritten pages and
13 that said typewritten transcript is a true, accurate
14 and complete record of my stenographic notes so
15 taken.

16 I further certify that I am not
17 related by blood or marriage to any of the parties
18 hereto and that I have no interest in the outcome of
19 the captioned case.

20 Given under my hand this the

21 day of , , at
22 Louisville, Kentucky.

23 My commission as Notary Public expires
24 November 5, 2023.

25
26 ELLEN L. COULTER
27 NOTARY PUBLIC
28 Notary I.D. 634549